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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE CONSTRUCTION
INDUSTRY AND LABORERS HEALTH
AND WELFARE TRUST; TRUSTEES OF
THE CONSTRUCTION INDUSTRY AND
LABORERS JOINT PENSION TRUST;
TRUSTEES OF THE CONSTRUCTION
INDUSTRY AND LABORERS
VACATION TRUST; and TRUSTEES OF
THE SOUTHERN NEVADA LABORERS
LOCAL 872 TRAINING TRUST,

Plaintiffs,

vs.

WILLIAMS BROTHER INC., a Nevada
corporation, and MICHAEL PEEK, an
individual,

Defendant.

CASE NO.

STIPULATED/CONSENT JUDGMENT

Williams Brother Inc., a Nevada corporation ("Williams"), and Michael Peek, an individual, hereby stipulate and consent to entry of judgment in favor of Plaintiffs, Trustees of the Construction Industry and Laborers Health and Welfare Trust, Trustees of the Construction Industry and Laborers Joint Pension Trust, Trustees of the Construction Industry and Laborers Vacation Trust, and Trustees of the Southern Nevada Laborers Local 872 Training Trust

(collectively "Trust Funds"), and against Williams and Michael Peek, jointly and severally, in the total sum of \$98,262 for delinquent employee benefit contributions and related costs and fees owed under the Employee Retirement Income Security Act of 1974 ("ERISA").

The parties have stipulated and therefore the Court finds:

1. Williams is signatory to and bound by the terms of a collective bargaining agreement ("CBA") with the Southern Nevada Laborers Local 872 ("Union"), in which Williams agreed to abide by the trust agreements establishing the respective Trust Funds and any amendments thereto ("Trust Agreements").

2. Under the CBA and the Trust Agreements, Williams is obligated to pay employee benefit contributions to the Trust Funds on behalf of Williams's bargaining unit employees represented by the Union.

3. Based on contract compliance review of Williams for the period of August 8, 2006, through May 31, 2011, Williams owes the Trust Funds Sixteen Thousand Three Hundred Fifty-four Dollars (\$93,262) in employee benefit contributions, attorney fees, interest and liquidated damages to date.

4. In addition, in the event this judgment must be executed, the Trust Funds will incur additional fees and costs determined by the parties to be at least \$5,000, which are therefore included herein.

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5. This Stipulated/Consent Judgment is entered into by and between Williams and Michael Peek, on one hand, and the Trust Funds, on the other hand, for employee benefit contributions and related costs and fees owed to the Trust Funds by ERISA.

December 16, 2011.

December 16th, 2011.

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

WILLIAMS BROTHER INC., a Nevada
corporation,

Adam P. Segal, Esq.
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by: Michael Peek, President & Director

Telephone: _____
Facsimile: _____

For himself, and WILLIAMS BROTHER INC.,
a Nevada corporation,

Attorneys for the Trust Funds

JUDGMENT

Judgment is hereby entered against Williams Brother Inc., a Nevada corporation, and Michael Peek, jointly and severally, in favor of the Trust Funds in the amount of \$98,262.

Dated December 20, 2012.

James C. Mahan
U.S. DISTRICT COURT JUDGE

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, Nevada 89106
(702) 382-2101

1 STATE OF NEVADA)
 2) ss.
 3 COUNTY OF _____)

4 Michael Peek, being first duly sworn, deposes and says:

5 That he/she is the President and a Director of Williams Brother Inc., a Nevada
 6 corporation, and is duly authorized to execute this document; that he/she has read the foregoing
 7 Stipulated/Consent Judgment and knows the contents thereof; that the same is true of his/her own
 8 knowledge, except for those matters therein stated on information and belief, and as to those
 9 matters he/she believes them to be true.

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 11 _____

12 Affiant

13 Subscribed and sworn to before me
 14 this 6th day of December 2011.

15 
 16 - NOTARY PUBLIC -



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